

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA**

Michael Conrad, on behalf of himself and) Case No.: 4:24-cv-307
others similarly situated,)
)
Plaintiff,)
)
v.)
)
Hart Consumer Products, Inc.,)
)
Defendant.)
)

)

PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiff Michael Conrad respectfully moves this Court for a fourteen (14) day extension of time to file his Response Brief in opposition to Defendant Hart Consumer Products Inc.'s renewed motion to dismiss. In support of this motion, Plaintiff states as follows:

1. On August 27, 2025, the Court entered an order granting Defendant leave to file a renewed motion to dismiss and setting the following briefing schedule: Defendant's motion due September 10, 2025; Plaintiff's response due September 24, 2025; Defendant's reply due October 1, 2025 (Doc. 22).
2. Defendant timely filed its renewed motion to dismiss on September 10, 2025.
3. Plaintiff's Response Brief is currently due on September 24, 2025.

4. Due to the press of other litigation deadlines, including overlapping briefing schedules in related matters, Plaintiff requires additional time to complete his Response Brief.

5. Plaintiff therefore requests a brief extension of fourteen (14) days, up to and including **October 8, 2025**, to file his Response Brief.

6. Counsel for Plaintiff has conferred with counsel for Defendant, who does not oppose this request.

7. Counsel for the Defendant has indicated that it also may move for an extension of time on their reply, which the Plaintiff does not oppose.

8. This brief extension will not prejudice Defendant and will not unduly delay the proceedings.

For the foregoing reasons, Plaintiff respectfully requests that the Court extend the deadline for his Response Brief by fourteen (14) days, from September 24, 2025 to October 8, 2025.

Dated: September 22, 2025

Respectfully submitted,

/s/ Anthony Paronich
Anthony I. Paronich (*pro hac vice*)
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Tel: (617) 485-0018
anthony@paronichlaw.com

Steve Koval
The Koval Firm, LLC
3575 Piedmont Rd NE
15 Piedmont Center Suite 120
Atlanta, GA 30305
Steve@KovalFirm.com

Counsel for Plaintiff and the proposed class